WHITE RIVER SHALE OIL CORPORATION SUITE 500 PRUDENTIAL BUILDING, 115 SOUTH MAIN STREET SALT LAKE CITY, UTAH 84111 (801) 363-1170 February 18, 1983 FEB 1 8 1983 Mr. James W. Smith Coordinator Mined Land Development Utah Division of Oil, Gas, and Mining 4241 State Office Building Salt Lake City, Ut 84114 Re: Permit ACT/047/017 Dear Mr. Smith: This letter constitutes acceptance by the White River Shale Oil Corporation (WRSOC) of two conditions outlined in letters of January 4, 1983 and January 10, 1983 from your office concerning a 360 acre expansion request by WRSOC for the White River Shale Project. More specifically,

1. WRSOC accepts that any project activities which would occur outside of the 470 acre approved work area must be approved by the Division of Oil, Gas, and Mining prior to implementation. DOGM approval is expected to take a minimum of 60 days. In addition, any activity which occurs within the 470 acre approved area, but is not described in the May, 1982 Phase I Mining Permit Application, will be reviewed with DOGM staff prior to implementation.

2. WRSOC has instituted a program for the purpose of providing better on-site control over disturbed acreage. It consists of the following:

- Before any construction activity occurs, the area to be disturbed is flagged based upon a reasonable estimate of the area required for construction.
- b. This is reviewed by the WRSOC Construction Manager and is thoroughly discussed with the construction subcontractor to ensure their full understanding of the applicable limits of work before construction begins.
- c. As construction proceeds, should there be a need to expand the agreed upon work area, this is first discussed with the Construction Manager who will issue clearances, as needed to provide additional area. The Construction Manager will consult with WRSOC -Environmental Affairs as necessary prior to authorizing such expansions.

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- d. Following completion of the construction activity or at least once every three months, the additional areas of disturbance will be surveyed and added to the results of our previous surveys to determine the total area of disturbance. This will be reported to DOGM as requested.
- 3. It is our understanding that the question of "double bonding" has been resolved. Currently WRSOC holds \$1 million and \$1.5 million reclamation bonds with BLM and DOGM, respectively. Based upon your estimate of \$4.4 million reclamation bond for the full 470 acre approved work area, WRSOC has authorized its surety to increase the BLM bond from \$1 million to \$2.9 million. WRSOC will receive a rider to the current BLM bond shortly and will provide DOGM a copy. It is planned that on August 19, 1983, the date our \$1.5 million reclamation bond with DOGM is scheduled for renewal, the bond will be reissued with the BLM, who will continue to hold all reclamation bonds for the WRSP.

If you have any questions on the above, please contact me.

Sincerely,

James W. Godlove

Director of Environmental Affairs

JWG/djh

cc: E. Hoffman